



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

William C. Oldaker, Treasurer
Glacier PAC
818 Connecticut Avenue, NW, Suite 1100
Washington, DC 20006

DEC 13 2000

Identification Number: C00353953

Reference: August Monthly Report (7/01/00-7/31/00)

Dear Mr. Oldaker:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "June 2000 Consulting",

"agent fee", and "event services". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your EVENT YEAR-TO-DATE calculations for administrative/voter drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Your EVENT YEAR-TO-DATE calculations for fundraising are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to Dan Geisler. Please amend your report to disclose the appropriate category.

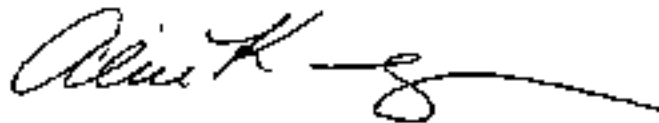
-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include a unique identifying title or code for the payment(s) made to Carroll Travel and Big Sky International Air Show. 11 CFR §104.10. Please amend this report to provide a unique identifying title or code for each entry omitting this information.

-You have received a contribution from Kirkland and Ellis, which appears

to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alice Kang", followed by a long horizontal flourish.

Alice Kang
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

7 / 18

FOR LINE NUMBER
23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Glacier PAC

Full Name, Mailing Address, and ZIP Code

NANCY KEENAN FOR MONTANA
PO BOX 9248

HELENA MT 59604

Purpose of Disbursement

(House - MT - 00)
Contribution

**Date (month,
day, year)**

07/27/2000

**Amount of Each
Disbursement This
Period**
1000.00

Disbursement for: ☒ Primary ☐ General

☐ Other (specify): MT primary was 6/18/00

Full Name, Mailing Address, and ZIP Code

ROBB FOR THE SENATE
POST OFFICE BOX 1279

MCLEAN VA 22101

Purpose of Disbursement

(Senate - VA - 00)
Contribution

**Date (month,
day, year)**

07/27/2000

**Amount of Each
Disbursement This
Period**
1000.00

Disbursement for: ☒ Primary ☐ General

☐ Other (specify): VA primary was 6/13/00

Full Name, Mailing Address, and ZIP Code

SCHWEITZER FOR US SENATE
PO BOX 8172

MISSOULA MT 59801

Purpose of Disbursement

(Senate - MT - 00)
Contribution

**Date (month,
day, year)**

07/27/2000

**Amount of Each
Disbursement This
Period**
1000.00

Disbursement for: ☒ Primary ☐ General

☐ Other (specify): MT primary was 6/18/00

Full Name, Mailing Address, and ZIP Code

ZELL MILLER FOR SENATE INC
1100 SPRING STREET SUITE 104

ATLANTA GA 30309

Purpose of Disbursement

(Senate - GA - 00)
Contribution

**Date (month,
day, year)**

07/27/2000

**Amount of Each
Disbursement This
Period**
1000.00

Disbursement for: ☒ Primary ☐ General

☐ Other (specify): GA primary was 7/18/00

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

4000.00

